



**DTE Energy®**

## **Fermi 2 – License Amendment Request**

**Pre-Submittal Conference Call  
February 9, 2017**



# Agenda

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- Planned Content of Submittal
- Background
- Planned Schedule for Submittal and Requested Approval

## Planned Content of Submittal

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- Fermi 2 License Amendment Request (LAR) to Revise Technical Specifications (TS) for High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) Instrumentation
- Proposed Fermi 2 LAR will be very similar to the recent precedent of Limerick and Nine Mile Point 2 LARs
- Differences from this precedent are limited to plant-specific differences such as setpoint values and TS numbering
- Fermi 2 LAR technical justification will be based on a General Electric (GE) analysis very similar to the technical evaluation included in the Limerick LAR

## Background

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- Unresolved Issue (URI) (05000352;05000353/2015001-03) opened in May 2015 for Limerick for “Operability of High Pressure Coolant Injection and Entries into Operational Conditions at Low Reactor Pressures with High Reactor Water Level Trip Actuated”
- Limerick submitted a LAR in April 2016 (ML16095A275)
- The LAR was a change to the TS to add a footnote clarifying operability of certain HPCI/RCIC functions at low pressure conditions
- Nine Mile Point 2 submitted a LAR in November 2016 (ML16333A001)
  - Similar to Limerick LAR, except it was requested (and approved) on emergency basis to allow normal plant startup following a forced outage

# Planned Schedule for Submittal and Requested Approval



- DTE plans to submit the LAR in February 2017
- Fermi 2 refueling outage begins in March 2017
- NRC approval is requested to support this refueling outage
- The LAR is being submitted on an exigent basis and the LAR will explain why the exigent situation occurred and why it could not be avoided per 10 CFR 50.91(a)(6)
  - Nine Mile Point 2 precedent identified LAR was needed prior to any plant startup to prevent violation of TS Limiting Condition for Operation (LCO) 3.0.4 during plant startup
  - Fermi 2 identified that this could also result in unnecessarily declaring HPCI and RCIC injection functions inoperable during normal plant shutdown
  - Fermi 2 refueling outage and associated startup were planned prior to identification of the need for this LAR and GE analysis was needed to support this LAR